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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICHAEL J. FLYNN, and PHILIP  
STILLMAN,

Plaintiffs,

v.

MICHAEL E. LOVE, an individual;  
JACQUELYNE LOVE, an individual;  
MICHAEL E. LOVE as TRUSTEE OF THE  
MICHAEL LOVE FAMILY TRUST;  
MELECO, INC., a Nevada corporation; and  
DOES 1-10

Defendants.

Case No.: 3:19-cv-239-MMD-CLB

**STIPULATION AND PROPOSED ORDER  
EXTENDING TIME FOR DEFENDANTS TO  
FILE A MOTION REGARDING PLAINTIFFS'  
ASSERTION OF PRIVILEGE**

***FIRST REQUEST***

Plaintiffs Michael J. Flynn and Philip Stillman ("Plaintiffs"), appearing *pro se*, and  
Defendants Michael Love, individually and as trustee of the Michael Love Family Trust,  
Jacquelyne Love, and Meleco, Inc. (collectively, "Defendants") by and through their attorneys of

record, the law firm Greenberg Traurig, LLP, hereby stipulate and request that Defendants' have up to, and including, August 27, 2021 by which to file any motion regarding Plaintiffs' assertion of privilege. This stipulation is made and based upon the following:

1. At the June 28, 2021 case management conference, the Court addressed Plaintiffs' assertion of privilege over certain documents and communications and the corresponding privilege log requirements. In particular, the Court ordered plaintiffs to provide said log no later than July 29, 2021 and Defendants to file any motion challenging the same within 14 days of receipt. ECF No. 150 at pg. 2 (Order).

2. Mr. Stillman has provided a log, however the parties are working through issues concerning its readability and hope to resolve those without Court intervention.

3. Accordingly, the parties hereby stipulate and request that the time by which Defendants must file a motion, if any, regarding Plaintiffs' assertion of privilege and attendant log be extended to **August 27, 2021**.

4. This is the first request for an extension of time and is made in good faith, not for purposes of delay.

IT IS SO STIPULATED.

Dated this 10<sup>th</sup> day of August 2021.

Dated this 10<sup>th</sup> day of August 2021.

**GREENBERG TRAURIG, LLP**

/s/ Philip Stillman

MICHAEL J. FLYNN, ESQ.

*Appearing Pro Se*

PHILIP STILLMAN, ESQ.

*Appearing Pro Se*

*Plaintiffs*

/s/ Jason Hicks

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*Attorneys for Defendants*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated this 11<sup>th</sup> day of August 2021.